1 2	KIMBERLY P. STEIN, ESQ. Nevada Bar No. 8675 kps@fdlawlv.com		
	FLANGAS DALACAS LAW GROUP		
3	3275 South Jones Boulevard, Suite 105 Las Vegas, NV 89146		
4	Telephone: (702) 307-9500 Attorneys for Plaintiff/Counterclaim Defendant Tsai-Lu Shen		
5	UNITED STATES DISTRICT COURT		
6	DISTRICT OF NEVADA		
7	TSAI-LU SHEN, an individual,	Case No: 2:19-CV-01564-JAD-VCF	
8	Plaintiff,	STIPULATION AND ORDER TO	
9	V.	DISMISS	
10			
11	MICHELLE LACOUR, an individual; DOES I-X, inclusive; and ROE CORPORATIONS I-X, inclusive,		
12	Defendants.	ECF No. 116	
13	MICHELLE LACOUR,	Let No. 110	
14	, in the second		
15	Counterclaimant,		
16	V.		
17	TSAI-LU SHEN,		
18	Counterclaim Defendant,		
19	MICHELLE LACOUR,		
20	Third-Party Plaintiff,		
21	v.		
22	JAYSON BAYBUTT and PUBCO		
23	REPORTING SOLUTIONS, INC.,		
24	Third-Party Defendants.		
25		•	
26	IT IS HEREBY AGREED AND STIPULATED, by the Parties hereto that the		
27	above-entitled matter be dismissed with prejudice, each party to bear its own costs and		

1	attorney's fees.	
2	There is currently no trial or hearings scheduled in this matter.	
3	Respectfully submitted by:	
4	Dated: April 19, 2021	Dated: April 19, 2021
5	/s/ Kimberly P. Stein	/s/John K. Gallagher
6	KIMBERLY P. STEIN, ESQ. Nevada Bar No. 8675	JOHN K. GALLAGHER ESQ. Nevada Bar No. 956
7	FLANGAS DALACAS LAW GROUP 3275 S. Jones Blvd., Suite 105	S. TIMOTHY SUMMERS, ESQ. Nevada Bar No. 12285
8	Las Vegas, NV 89146 Attorneys for Plaintiff/Counterclaim	PATRICK H. GALLAGHER, ESQ. Nevada Bar No. 14875
9	Defendant Tsai-Lu Šhen	GUILD, GALLAGHER, FULLER, LTD. 100 W. Liberty St., Ste. 800 Reno, Nevada 89501
10		JOHN H. JAMNBACK, ESQ. Washington State Bar No. 29872
12		(pro hac vice approved) YARMUTH LLP
13		1420 Fifth Ave., Suite 1400 Seattle, WA 98101
14	Dated: April 19, 2021	Attorneys for Defendant Michelle LaCour
15	/s/Michael E. Sullivan MICHAEL E. SULLIVAN, ESQ. Nevada Bar No. 5412	
16		
17	ROBISON, SHARP, SULLIVAN & BRUST 71 Washington Street	
18	Reno, NV 89503 WRIGHT NOEL, ESQ. Washington State Ban No. 25264	
19	Washington State Bar No. 25264 (pro hac vice approved)	
20	CARSON-NOEL PLLC 20 Sixth Avenue, NE	
21	Issaquah, WA 98027 Attorneys for Third Party Defendants Issan Raybutt and Pubes Reporting Solutions	
22	Jason Baybutt and Pubco Reporting Solutions	
23	<u>ORDER</u>	
24	Based on the parties' stipulation [ECF No. 116] and good cause appearing, IT IS	
25	HEREBY ORDERED that THIS ACTION IS DISMISSED with prejudice, each side to	
26	bear its own fees and costs. The Clerk of Court is directed to CLOSE THIS CASE.	
27	U.S. District Judge Jennifer A. Dorsey	
28		Dated: April 20, 2021